

**MEMO ENDORSED**



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June 2, 2022

**-By Hand-**

Chambers of the Hon. Lewis A. Kaplan  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

**Re:** *United States v. Fabrice Tontisabo*  
1:21-cr-00701-LAK-1  
Motion to File Exhibit Under Seal

Dear Judge Kaplan:

Our office represents Mr. Fabrice Tontisabo, whose pretrial motion, memorandum of law and supporting exhibits were filed on 05/31/22 (ECF Docs. 21, 22). Referenced in that filing was "Ex. A - Snapchat Affidavit USAO\_000354-000372," which consists of a search and seizure warrant and supporting agent affidavit. *See*, ECF Doc. 22, Attachment #1. We request that the Court permit this exhibit to be filed under seal, for the reasons which follow.

The subject warrant was originally obtained under a sealed oral order signed by Magistrate Judge Stewart D. Aaron on 09/09/2021 (1:21-mj-08751-UA). *See*, ECF Entry Only, 09/09/2021. There has been no subsequent order or motion permitting it to be unsealed. Further, this exhibit was produced to the defendant in discovery disclosure by the Government subject to Protective Order (ECF Doc. 14), which remains in effect. Accordingly, we ask that leave be granted to file defendant's "Ex. A - Snapchat Affidavit USAO\_000354-000372" under seal.

Thank you for your attention.

Respectfully submitted,

/s/ Conor McNamara  
Conor McNamara, Esq.

cc: AUSA Camille L. Fletcher (*by ECF*)

**Granted.**

**SO ORDERED. Date: June 9, 2022**

/s/ Lewis A. Kaplan  
Lewis A. Kaplan, U.S. District Judge